



Las Vegas Urban League
A Nevada Community Action Agency



April 18, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service Lifeline and Link Up
CC Docket No. 96-45; WC Docket 03-109; WC Docket 11-42**

Dear Chairman Genachowski,

The FCC's low-income Lifeline programs have been vital to our membership, especially since the beginning of the *great recession*. For the many financially disadvantaged (state residents) that we represent – families, seniors, the disabled and the working poor – having access to a free cell phone can often make the difference between being able to find gainful employment or not; it can also be the difference between life and death in an emergency.

In 2010 The Las Vegas Urban League, a Nevada Community Action Agency served over 23,000 individuals through our various Programs and centers: Employment and training, Child Care, WIC, Senior Center, Plus program, Prison Re-Integration Program, Education programs, Computer centers, and Weatherization. The Las Vegas Urban League is committed to reach out and served the low-income families throughout the valley.

It is for these reasons that we would like to thank you for your leadership, and for that of the FCC, in reforming and modernizing the Lifeline program. Our members are grateful for the services provided through the Lifeline program, and we would like to see the program remain robust, effective and accessible so that our members can continue using these vital services as we climb out of the recession of the past few years.

We agreed with many of the FCC's recommendations to strengthen Lifeline and eliminate waste, fraud and abuse in the program. However, we were extremely discouraged by three particular proposals: to cap the program, either temporarily or permanently; to place a "minimum charge" on users of Lifeline; and to eliminate the use of previous "self-certification" procedures.

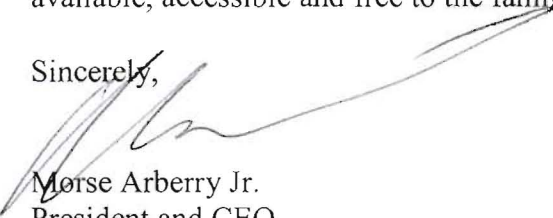
Capping the Lifeline program at this critical economic moment in the United States is both unwise and counterproductive. While this program has expanded rapidly since wireless phone companies were allowed to participate, this has made a program that was for years uneconomical for exactly the people it was meant to serve into a program that is having real impact on people's lives and livelihoods.

The proposals which impose a “minimum charge” on Lifeline users and eliminate the ability of these users to “self-certify” their eligibility for the program, are of serious concern to us as we believe both proposals provide unreasonable and unfair barriers to entry to Lifeline-eligible Americans (or state residents). We believe that imposing any sort of fee on eligible users of this program would be an enormous deterrent to participation.

Likewise, the idea of eliminating users ability to “self-certify” their eligibility for the program is unfair to the consumers and in many cases very difficult to accomplish. Many people who qualify for Lifeline, particularly minorities and seniors, simply do not have access to the computers, scanners, faxes or photocopiers necessary to prove that there are eligible to receive Lifeline services.

The Lifeline program is extraordinarily important to our members and to our community. The FCC’s efforts to strengthen Lifeline by eliminating waste, fraud and abuse are necessary and admirable. But we hope that the FCC is equally focused on taking strong action to ensure that Lifeline services remain available, accessible and free to the families and individuals who need them most.

Sincerely,



Morse Arberry Jr.
President and CEO

CC:

Commissioner Michael J. Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker